PART 9900: TECHNICAL GUIDANCE

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AMERICAN SOCIETY OF MECHANICAL ENGINEERS
ASME BOILER AND PRESSURE VESSEL CODE, SECTION IX

### A. PURPOSE

To provide guidance on ASME Boiler and Pressure Vessel Code, Section IX, paragraphs QW-321 and QW-322, as provided in an NRR memorandum dated January 13, 1986.

#### B. BACKGROUND

Because of the concern over the validity of welder performance qualifications at the Watts Bar site, the Tennessee Valley Authority (TVA) suspended all welding operations on August 23, 1985. To restart welding at the site, TVA elected to test the welders in accordance with ASME Section IX QW-322, "Renewal of Qualification." A significant number of welders failed the initial attempt to pass the test. TVA then elected to give the welders additional training and retested them under the same provision of the renewal of qualification test.

## C. DISCUSSION

The 1983 Edition of the Code provides in QW-322(c) that "when there is a specific reason to question his [welder's] ability to make welds that meet the specification, his qualification, which supports the welding that he is doing, shall be considered expired." The reason TVA submitted all welders except those recently qualified by performance qualification tests to the renewal of qualification test was that the Code procedures for renewing qualifications appeared not to have been followed and that the welder qualification records were falsely marked. This was substantiated by subsequent independent investigation.

Considering the discrediting of the welder performance qualification records at the Watts Bar site in addition to welders failing the simple renewal of qualification test, NRR believed that there was adequate reason to question the ability of the welders to make acceptable welds. Accordingly, the welders' performance qualifications should be considered expired, and all performance qualifica-

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tion tests necessary for the welder to perform Code-classed welds must be performed.

Recognizing that this matter involves an official interpretation of the Code, TVA submitted an inquiry to the ASME. However, this inquiry was predicated on the basis that the ability of the welder or welding operator with expired qualification was not an issue. Since this premise may not accurately reflect conditions

at Watts Bar, NRR sent an inquiry to ASME probing the acceptability of the renewal of qualification tests when the ability of a welder or welding operator is in question or when failures occur when renewal of qualification tests are taken. Following the receipt of a response from ASME, appropriate formal action will be taken.

# D. CONCLUSION

Until the response from ASME is received and an official position is taken, the above guidance represents the NRC position on interpreting the Code and should be used in the interim.

## E. REFERENCE

The guidance provided in this directive was extracted from a memorandum from Thomas M. Novak, Acting Director, Division of PWR Licensing-A, NRR, to A. F. Gibson, Director, Division of Reactor Safety, Region II, dated January 13, 1986, subject: NRC Position on Interpretation of Paragraph QW-320 of Section IX of the ASME Boiler and Pressure Vessel Code. The complete memorandum is in the Document Control System (DCS microfiche #68254-204).

END

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